



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

January 29, 1999

Patricia Ford, Treasurer  
Service Employees International Union  
Political Campaign Committee  
1313 L Street, NW  
Washington, DC 20005

Identification Number: C00004036

Reference: Amended July Monthly Report (6/1/98-6/30/98), dated 11/17/98

Dear Ms. Ford:

On December 9, 1998, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission is in receipt of your counsel's letter as well as the letter from SEIU Local 1199's counsel, both dated December 23, 1998. Counsel for SEIU Local 1199 states that a "portion of the permissible funds transferred by Local 1199 to SEIU COPE in June 1998 may have been raised prior to the date that the committees became affiliated in April 1998."

11 CFR 102.6(b)(1) defines a collecting agent as an organization or committee that collects and transmits contributions to one or more separate segregated funds ("SSF") *to which the collecting agent is related*. A collecting agent may be either a committee affiliated with the SSF; the connected organization of the SSF; a subsidiary, branch, division, department or local unit of the connected organization of the SSF; or a local union collecting contributions on behalf of the SSF of any federation with which the local is affiliated.

According to your letters dated November 16 and December 23, 1998, SEIU and Local 1199 became affiliated in April 1998 though this information was not disclosed until an amended Statement of Organization was filed on October 2, 1998 - approximately 4 months after the \$770,714 transfer-in. Prior to April 1998, Local 1199 transferred contributions from its collecting agent account to either its federal or non-